

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LEONARDO PAJARITO, CARLOS PEREZ, and
JONATHAN SANCHEZ, *individually and on behalf
of others similarly situated*,

7:21-CV-08343-CS

Plaintiffs,

-against-

LATIN BRANDS RESTAURANT GROUPS INC.
(D/B/A SALSA BEMBE), LUCAS LUCIDO,
DEVIS BERATI, and ALEX ARIZMENDI,

Defendants.

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TO: Catalina Sojo, Esq.
CSM Legal, PC
60 East 42nd Street, Suite 4510
New York, NY 10165
catalina@csm-legal.com

**OFFER OF JUDGMENT TO PLAINTIFFS
PURSUANT TO RULE 68 OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants LATIN BRANDS RESTAURANT GROUPS INC. (D/B/A SALSA BEMBE), LUCAS LUCIDO, DEVIS BERATI, and ALEX ARIZMENDI (collectively "Defendants") hereby offer to allow judgment to be taken against them by Plaintiffs LEONARDO PAJARITO, CARLOS PEREZ, and JONATHAN SANCHEZ ("Plaintiffs") in the above-captioned action in the total sum of Twenty-Two Thousand Five Hundred Dollars and No Cents (\$22,500.00), inclusive of reasonable attorney's fees, costs, and expenses to date of this offer, in full and final settlement of all of Plaintiffs' claims against Defendants arising out, alleged in, or related to, the facts and transactions alleged in the above-captioned action.

This judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiffs may have to damages, or any other form of relief, arising out of the alleged acts or omissions of Defendants or any owner, employee, or agent, either past or present, of the Defendants, or in connection with the facts and circumstances that are the subject of this action.

This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any of the Defendants, or any owner, employee, representative, or agent of any of the Defendants; nor is it an admission that Plaintiffs suffered any damages.

Acceptance of this offer of judgment will act to release and discharge Defendants, their respective successors or assigns, as well as all past and present owners, employees,

representatives, and agents of the Defendants from any and all claims that were or could have been alleged by Plaintiffs in the above-referenced action. Acceptance of this offer of judgment also will operate to waive Plaintiffs' rights to any claim for interest on the amount of the judgment.

In order for Plaintiffs to accept this offer, Plaintiffs must serve written notice of acceptance upon Defendants within fourteen (14) days after service of this Offer of Judgment. An offer not accepted within the specified period for acceptance will be deemed withdrawn.

Dated: New York, New York
July 30, 2022

Respectfully submitted,



Daniel I. Goldberg
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New York, NY 10022
Tel: (212) 545-1900
Email: digoldberg@offitkurman.com
Attorneys for Defendants

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**PLAINTIFFS' ACCEPTANCE
OF DEFENDANTS' OFFER OF
JUDGMENT PURSUANT TO
F.R.C.P. RULE 68**

Plaintiffs LEONARDO PAJARITO, CARLOS PEREZ, and JONATHAN SANCHEZ ("Plaintiffs"), by and through their undersigned counsel, hereby accept the Offer of Judgment, pursuant to Rule 68 of the Federal Rules of Civil Procedure, extended and served by Defendants LATIN BRANDS RESTAURANT GROUPS INC. (D/B/A SALSA BEMBE), LUCAS LUCIDO, DEVIS BERATI, and ALEX ARIZMENDI, (collectively, "Offering Defendants") on or about July 30, 2022 in the amount of \$22,500.00.

Dated: New York, New York
August 1, 2022



Frank J. Palermo, Esq.
CSM LEGAL, P.C.
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New York, NY 10165
Attorneys for Plaintiffs

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